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**BOARD OF REGISTERED NURSING  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

In the Matter of the Proposed Decision and  
Disciplinary Order Against:

PATRICIA CORONA  
99 Cable Circle  
Folsom, CA 95630

Registered Nurse License No. 718574

Respondent.

Case No. 2011-919  
OAH No. 2011060291

**STIPULATED SURRENDER OF  
LICENSE AND ORDER**

**DECISION AND ORDER**

The attached Stipulated Surrender of License and Order is hereby adopted by the  
Board of Registered Nursing, Department of Consumer Affairs, as its Decision in this matter.

It is so ORDERED on August 28, 2012.

This Decision shall become effective on August 28, 2012.

Louise R. Bailey, M.Ed., R.N.  
Louise R. Bailey, M.Ed., R.N., Executive Officer  
FOR THE BOARD OF REGISTERED NURSING  
DEPARTMENT OF CONSUMER AFFAIRS

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**BEFORE THE  
BOARD OF REGISTERED NURSING  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

In the Matter of the Proposed Decision and  
Disciplinary Order Against:

PATRICIA CORONA  
99 Cable Circle  
Folsom, CA 95630

Registered Nurse License No. 718574

Respondent.

Case No. 2011-919  
OAH No. 2011060291

**STIPULATED SURRENDER OF  
LICENSE AND ORDER**

IT IS HEREBY STIPULATED AND AGREED by and between the parties that  
the following matters are true:

PARTIES

1. Louise R. Bailey, M.Ed., R.N. (Complainant) is the Executive Officer of the Board of Registered Nursing, who brought this action solely in her official capacity.
2. Patricia Corona (Respondent), is representing herself in this proceeding and has chosen not to exercise her right to be represented by counsel.
3. On or about January 24, 2008, the Board of Registered Nursing issued Registered Nurse License No. 718574 to Patricia Corona (Respondent). The Registered Nurse license was in full force and effect at all times relevant to the charges brought in Accusation No. 2011-919 and will expire on March 31, 2013, unless renewed.

JURISDICTION

4. On April 19, 2012, the Board of Registered Nursing adopted Proposed Decision and Disciplinary Order No. 2011-919, which became effective on May 18, 2012. The Proposed Decision and Disciplinary Order requires, inter alia, the respondent to serve a 3-year probation term that includes Probation Conditions # 1-19. The Proposed Decision and Disciplinary Order is attached as exhibit A and incorporated herein by reference.

5. At all times after the effective date of Respondent's probation, Condition 13 states,

1                   **“License Surrender.** During Respondent’s term of probation, if she  
2 ceases practicing due to retirement, health reasons or is otherwise  
3 unable to satisfy the conditions of probation, Respondent may surrender  
4 her license to the Board. The Board reserves the right to evaluate  
5 Respondent’s request and to exercise its discretion whether to grant the  
6 request, or to take any other action deemed appropriate and reasonable  
7 under the circumstances, without further hearing. Upon formal  
8 acceptance of the tendered license and wall certificate, Respondent will  
9 no longer be subject to the conditions of probation.  
10

11                   Surrender of Respondent’s license shall be considered a disciplinary action  
12 and shall become a part of Respondent’s license history with the Board. A  
13 registered nurse whose license has been surrendered may petition the Board for  
14 reinstatement no sooner than the following minimum periods from the effective  
15 date of the disciplinary decision:

16                   (1)       Two years for reinstatement of a license that was surrendered for  
17 any reason other than a mental or physical illness; or

18                   (2)       One year for a license surrendered for a mental or physical illness.”  
19

#### 20                   ADVISEMENT AND WAIVERS

21                   6.       Respondent has carefully read and understands Proposed Decision  
22 and Disciplinary Order No. 2011-919. Respondent has carefully read, and understands the  
23 effects of this Stipulated Surrender of License and Order and understands that this Stipulated  
24 Surrender, if accepted by the Board, is considered as formal discipline of her license.

25                   7.       Respondent understands that by signing this stipulation she enables  
26 the Board to accept the surrender of her Registered Nurse License without further process.  
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1           13.     Respondent shall lose all rights and privileges as a Registered Nurse in  
2 California as of the effective date of the Board's Decision and Order.

3           14.     Respondent shall cause to be delivered to the Board both her pocket  
4 license and wall certificate, if one was issued, on or before the effective date of the Decision  
5 and Order.

6           15.     Respondent fully understands and agrees that if she ever files an application for  
7 licensure or a petition for reinstatement in the State of California, the Board shall treat it as a  
8 petition for reinstatement. Respondent must comply with all the laws, regulations and  
9 procedures for reinstatement of a revoked license in effect at the time the petition is filed, and all  
10 of the charges and allegations contained in Accusation No. 2011-919 shall be deemed to be true,  
11 correct and admitted by Respondent when the Board determines whether to grant or deny the  
12 petition.


13           16.     Upon reinstatement of the license by the Board, Respondent shall pay to  
14 the Board costs associated with its investigation and enforcement pursuant to Business and  
15 Professions Code section 125.3 in the amount of \$2,790.00 which is the amount currently  
16 owed pursuant to Proposed Decision and Disciplinary Order No. 2011-919 (Exhibit A). If the  
17 reinstatement of Respondent's license is granted, Respondent shall be permitted to pay these  
18 costs in a payment plan approved by the Board.

19           17.     Respondent shall not apply for licensure or petition for reinstatement for  
20 2 years from the effective date of the Board of Registered Nursing's Decision and Order.  
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ACCEPTANCE

I have carefully read the Stipulated Surrender of License and Order. I understand the stipulation and the effect it will have on my Registered Nurse License. I enter into this Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Registered Nursing.

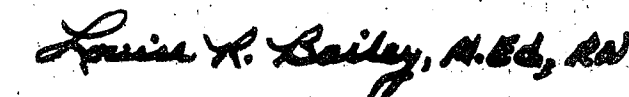
DATED: 8/20/2012

  
Patricia Corona  
Respondent

ENDORSEMENT

The foregoing Stipulated Surrender of License and Order is hereby respectfully accepted by Louise R. Bailey, M.Ed., R.N. (Complainant) as the Executive Officer for the Board of Registered Nursing.

DATED: August 28, 2012

  
Louise R. Bailey, M.Ed., R.N.  
Executive Officer

BOARD OF REGISTERED NURSING

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**EXHIBIT "A"**

Proposed Decision and Disciplinary Order No. 2011-919

BOARD OF REGISTERED NURSING  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

PATRICIA CORONA  
1108 Cardinal Street  
Lodi, CA 95240

Registered Nurse License No. 718574

Respondent.

CASE No. 2011-919

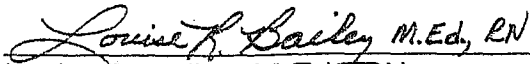
OAH No. 2011060291

**NOTICE OF DECISION AND ORDER**

No action having been taken on the attached Proposed Decision, pursuant to Government Code section 11517(c)(2) the attached decision is hereby deemed adopted by operation of law on April 19, 2012.

Pursuant to Government Code section 11519, this Decision shall become effective on May 18, 2012.

Date: April 19, 2012.

  
Louise R. Bailey, M.Ed., RN  
Interim Executive Officer  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California



BEFORE THE  
DEPARTMENT OF CONSUMER AFFAIRS  
THE SUCCESSOR TO THE BOARD OF REGISTERED NURSING  
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

PATRICIA CORONA  
Lodi, California 95240

Registered Nurse License No. 718574

Respondent.

Case No. 2011-919

OA# No. 2011060291

**PROPOSED DECISION**

This matter was heard before Dian M. Vorters, Administrative Law Judge, Office of Administrative Hearings, State of California, on January 6, 2012, in Sacramento, California.

Geoffrey S. Allen, Deputy Attorney General (DAG), represented the Board of Registered Nursing (Board and Complainant) on behalf of the Department of Consumer Affairs, Successor to the Board.

Daniel Thompson, Attorney at Law, represented Patricia Corona (respondent). The appearance of counsel and respondent was waived.<sup>1</sup>

A Stipulated Settlement and Disciplinary Order signed by the parties was received. The record remained open for complainant to submit two attachments to a Memorandum of Points and Authorities Authorizing the Department of Consumer Affairs to Act on Behalf of the Board of Registered Nursing During Sunset Period (Memorandum). On January 6, 2012, the OAH received Complainant's Attachments A (Governor Brown's Veto Letter) and B (Interagency Agreement Between Department and Board of Registered Nursing), to its Memorandum. The record closed on January 9, 2012.

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<sup>1</sup> The appearance of counsel and respondent was waived based on submission of the attached Stipulated Settlement and Disciplinary Order.

## FACTUAL FINDINGS

1. On January 24, 2008, the Board issued Registered Nurse License Number 718574 to respondent. Respondent's license will expire on March 31, 2013, unless renewed or revoked.

2. On or about May 9, 2011, Louise R. Bailey, M. Ed., RN, the Board's Executive Officer, issued an Accusation against respondent. The Accusation sought to revoke respondent's license based upon two convictions for driving with a blood alcohol content of .08 percent or more. (Veh. Code, § 23152, subd. (b).)

3. On or about January 4, 2012, complainant and respondent entered into a Stipulated Settlement and Disciplinary Order (Stipulated Settlement), a copy of which is attached hereto as Attachment A and made a part of this Proposed Decision.

4. At the hearing, complainant represented that the parties wish to settle all the charges and allegations set forth in the Accusation in accordance with the terms and conditions of the Stipulated Settlement. By her signature, respondent represented that she voluntarily, knowingly, and intelligently agreed to be bound by the Decision and Order of the Board or its successor; and knowingly and voluntarily waives her right to a hearing in this matter.


## LEGAL CONCLUSIONS

Pursuant to the representations of counsel for complainant, good cause exists to adopt the Stipulated Settlement as the Decision and Order in this matter.

## ORDER

The Stipulated Settlement and Disciplinary Order executed by the parties and attached hereto as Attachment A is the Decision and Order in this matter.

DATED: January 10, 2012.

  
DIAN M. VORTERS  
Administrative Law Judge  
Office of Administrative Hearings

1 KAMALA D. HARRIS  
Attorney General of California  
2 ARTHUR D. TAGGART  
Supervising Deputy Attorney General  
3 GEOFFREY S. ALLEN  
Deputy Attorney General  
4 State Bar No. 193338  
1300 I Street, Suite 125  
5 P.O. Box 944255  
Sacramento, CA 94244-2550  
6 Telephone: (916) 324-5341  
Facsimile: (916) 327-8643  
7 E-mail: Geoffrey.Allen@doj.ca.gov  
*Attorneys for Complainant*

8  
9 **BEFORE THE**  
**DEPARTMENT OF CONSUMER AFFAIRS**  
10 **THE SUCCESSOR TO THE BOARD OF REGISTERED NURSING**  
**STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

12 **PATRICIA CORONA**  
13 **1108 Cardinal Street**  
14 **Lodi, California 95240**

15 **Registered Nurse License No. 718574**

16 Respondent.

Case No. 2011-919

OAH No. 2011060291

**STIPULATED SETTLEMENT AND  
DISCIPLINARY ORDER**

17  
18 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-  
19 entitled proceedings that the following matters are true:

20 PARTIES

21 1. Louise R. Bailey, M.Ed., RN (Complainant) brought this action solely in her official  
22 capacity as the Executive Officer of the Board of Registered Nursing (Board), Department of  
23 Consumer Affairs. The action is maintained pursuant to a Delegation of Authority from the  
24 Board and its Executive Officer to the Department of Consumer Affairs, effective December 31,  
25 2011. The Board or its successor is represented in this matter by Kamala D. Harris, Attorney  
26 General of the State of California, by Geoffrey S. Allen, Deputy Attorney General.

27 ///

28 ///

2. Respondent Patricia Corona (Respondent) is represented in this proceeding by attorney Daniel Thompson, whose address is: Daniel Thompson, Goyette and Associates, 2366 Gold Meadow Way, Suite 200, Gold River, CA 95670.

3. On or about January 24, 2008, the Board issued Registered Nurse License No. 718574 (License) to Respondent. The License was in full force and effect at all times relevant to the charges brought in Accusation No. 2011-919 and will expire on March 31, 2013, unless renewed.

## JURISDICTION

4. Accusation No. 2011-919 (Accusation) was filed before the Board, Department of Consumer Affairs, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on May 9, 2011. Respondent timely filed her Notice of Defense contesting the Accusation. A copy of the Accusation attached as exhibit A and incorporated herein by reference.

## ADVICE AND WAIVERS

5. Pursuant to Business and Professions Code section 102.3, the Board delegated its duties to the Department of Consumer Affairs by way of an interagency agreement, effective December 31, 2011, until legislation re-establishing the Board takes effect. A copy of the interagency agreement is attached as Exhibit B and incorporated by reference.

6. Respondent acknowledges and agrees that the Board or its successor has continuing jurisdiction to discipline her license.

7. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in the Accusation. Respondent has also carefully read, fully discussed with counsel, and understands the effects of this Stipulated Settlement and Disciplinary Order.

8. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to be represented by counsel at her own expense; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration

1 and court review of an adverse decision; and all other rights accorded by the California  
2 Administrative Procedure Act and other applicable laws.

3 9. Respondent voluntarily, knowingly, and intelligently waives and gives up each and  
4 every right set forth above.

#### 5 CULPABILITY

6 10. Respondent admits the truth of each and every charge and allegation in the  
7 Accusation.

8 11. Respondent agrees that her License is subject to discipline and she agrees to be bound  
9 by the probationary terms as set forth in the Disciplinary Order below.

#### 10 CONTINGENCY

11 12. This stipulation shall be subject to approval by the Board or its successor pursuant to  
12 the Board's delegation of authority as set forth in the above referenced interagency agreement.  
13 Respondent understands and agrees that counsel for Complainant and Board staff may  
14 communicate directly with the Board or its successor regarding this stipulation and settlement,  
15 without notice to or participation by Respondent or her counsel.

16 By signing the stipulation, Respondent understands and agrees that she may not withdraw  
17 her agreement or seek to rescind the stipulation before the Board or its successor act on it or it  
18 becomes effective by operation of law pursuant to the Administrative Procedure Act (Gov. Code,  
19 § 11340 et seq.). If the Stipulated Settlement and Disciplinary Order is rejected by the Board or  
20 its successor as the final resolution of the pending accusation, it shall be of no force or effect,  
21 except for this paragraph it shall be inadmissible in any legal action between the parties, and the  
22 Board or its successor shall not be disqualified from further action by having considered this  
23 matter

24 13. The parties understand and agree that facsimile copies of this Stipulated Settlement  
25 and Disciplinary Order, including facsimile signatures thereto, shall have the same force and  
26 effect as the originals.

27 14. This Stipulated Settlement and Disciplinary Order is intended by the parties to be an  
28 integrated writing representing the complete, final, and exclusive embodiment of their agreement.

1 It supersedes any and all prior or contemporaneous agreements, understandings, discussions,  
2 negotiations, and commitments (written or oral). This Stipulated Settlement and Disciplinary  
3 Order may not be altered, amended, modified, supplemented, or otherwise changed except by a  
4 writing executed by an authorized representative of each of the parties.

5 15. In consideration of the foregoing admissions and stipulations, the parties agree that  
6 the Board or its successor may, without further notice or formal proceeding, issue and enter the  
7 following Disciplinary Order:

8 **DISCIPLINARY ORDER**

9 IT IS HEREBY ORDERED that Registered Nurse License No. 718574 issued to  
10 Respondent Patricia Corona is revoked. However, the revocation is stayed and Respondent is  
11 placed on probation for three (3) years on the following terms and conditions.

12 **Severability Clause.** Each condition of probation contained herein is a separate and  
13 distinct condition. If any condition of this Order, or any application thereof, is declared  
14 unenforceable in whole, in part, or to any extent, the remainder of this Order, and all other  
15 applications thereof, shall not be affected. Each condition of this Order shall separately be valid  
16 and enforceable to the fullest extent permitted by law.

17 1. **Obey All Laws.** Respondent shall obey all federal, state and local laws. A full and  
18 detailed account of any and all violations of law shall be reported by Respondent to the Board or  
19 its successor in writing within seventy-two (72) hours of occurrence. To permit monitoring of  
20 compliance with this condition, Respondent shall submit completed fingerprint forms and  
21 fingerprint fees within 45 days of the effective date of the decision, unless previously submitted  
22 as part of the licensure application process.

23 **Criminal Court Orders:** If Respondent is under criminal court orders, including  
24 probation or parole, and the order is violated, this shall be deemed a violation of these probation  
25 conditions, and may result in the filing of an accusation and/or petition to revoke probation.

26 2. **Comply with the Board or its successor's Probation Program.** Respondent shall  
27 fully comply with the conditions of the Probation Program established by the Board or its  
28 successor and cooperate with representatives of the Board or its successor in its monitoring and

1 investigation of the Respondent's compliance with the Probation Program. Respondent shall  
2 inform the Board or its successor in writing within no more than 15 days of any address change  
3 and shall at all times maintain an active, current license status with the Board or its successor,  
4 including during any period of suspension.

5 Upon successful completion of probation, Respondent's License shall be fully restored.

6 **3. Report in Person.** Respondent, during the period of probation, shall appear in  
7 person at interviews/meetings as directed by the Board or its successor or their designated  
8 representatives.

9 **4. Residency, Practice, or Licensure Outside of State.** Periods of residency or  
10 practice as a registered nurse outside of California shall not apply toward a reduction of this  
11 probation time period. Respondent's probation is tolled, if and when she resides outside of  
12 California. Respondent must provide written notice to the Board or its successor within 15 days  
13 of any change of residency or practice outside the state, and within 30 days prior to re-  
14 establishing residency or returning to practice in this state.

15 Respondent shall provide a list of all states and territories where she has ever been licensed  
16 as a registered nurse, vocational nurse, or practical nurse. Respondent shall further provide  
17 information regarding the status of each license and any changes in such license status during the  
18 term of probation. Respondent shall inform the Board or its successor if she applies for or obtains  
19 a new nursing license during the term of probation.

20 **5. Submit Written Reports.** Respondent, during the period of probation, shall submit  
21 or cause to be submitted such written reports/declarations and verification of actions under  
22 penalty of perjury, as required by the Board or its successor. These reports/declarations shall  
23 contain statements relative to Respondent's compliance with all the conditions of the Probation  
24 Program. Respondent shall immediately execute all release of information forms as may be  
25 required by the Board or its successor or their representatives.

26 Respondent shall provide a copy of this Decision to the nursing regulatory agency in every  
27 state and territory in which she has a registered nurse license.

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1           6.     **Function as a Registered Nurse.** Respondent, during the period of probation, shall  
2 engage in the practice of registered nursing in California for a minimum of 24 hours per week for  
3 6 consecutive months or as determined by the Board or its successor.

4           For purposes of compliance with the section, "engage in the practice of registered nursing"  
5 may include, when approved by the Board or its successor, volunteer work as a registered nurse,  
6 or work in any non-direct patient care position that requires licensure as a registered nurse.

7           The Board or its successor may require that advanced practice nurses engage in advanced  
8 practice nursing for a minimum of 24 hours per week for 6 consecutive months or as determined  
9 by the Board or its successor.

10          If Respondent has not complied with this condition during the probationary term, and  
11 Respondent has presented sufficient documentation of her good faith efforts to comply with this  
12 condition, and if no other conditions have been violated, the Board or its successor, in its  
13 discretion, may grant an extension of Respondent's probation period up to one year without  
14 further hearing in order to comply with this condition. During the one year extension, all original  
15 conditions of probation shall apply.

16          7.     **Employment Approval and Reporting Requirements.** Respondent shall obtain  
17 prior approval from the Board or its successor before commencing or continuing any  
18 employment, paid or voluntary, as a registered nurse. Respondent shall cause to be submitted to  
19 the Board or its successor all performance evaluations and other employment related reports as a  
20 registered nurse upon request of the Board or its successor.

21          Respondent shall provide a copy of this Decision to her employer and immediate  
22 supervisors prior to commencement of any nursing or other health care related employment.

23          In addition to the above, Respondent shall notify the Board or its successor in writing  
24 within seventy-two (72) hours after she obtains any nursing or other health care related  
25 employment. Respondent shall notify the Board or its successor in writing within seventy-two  
26 (72) hours after she is terminated or separated, regardless of cause, from any nursing, or other  
27 health care related employment with a full explanation of the circumstances surrounding the  
28 termination or separation.



1        8.     **Supervision.** Respondent shall obtain prior approval from the Board or its successor  
2 regarding Respondent's level of supervision and/or collaboration before commencing or  
3 continuing any employment as a registered nurse, or education and training that includes patient  
4 care.

5        Respondent shall practice only under the direct supervision of a registered nurse in good  
6 standing (no current discipline) with the Board or its successor, unless alternative methods of  
7 supervision and/or collaboration (e.g., with an advanced practice nurse or physician) are  
8 approved.

9        Respondent's level of supervision and/or collaboration may include, but is not limited to the  
10 following:

11        (a)    Maximum - The individual providing supervision and/or collaboration is present in  
12 the patient care area or in any other work setting at all times.

13        (b)    Moderate - The individual providing supervision and/or collaboration is in the patient  
14 care unit or in any other work setting at least half the hours Respondent works.

15        (c)    Minimum - The individual providing supervision and/or collaboration has person-to-  
16 person communication with Respondent at least twice during each shift worked.

17        (d)    Home Health Care - If Respondent is approved to work in the home health care  
18 setting, the individual providing supervision and/or collaboration shall have person-to-person  
19 communication with Respondent as required by the Board or its successor each work day.

20 Respondent shall maintain telephone or other telecommunication contact with the individual  
21 providing supervision and/or collaboration as required by the Board or its successor during each  
22 work day. The individual providing supervision and/or collaboration shall conduct, as required  
23 by the Board or its successor, periodic, on-site visits to patients' homes visited by Respondent  
24 with or without Respondent present.

25        9.     **Employment Limitations.** Respondent shall not work for a nurse's registry, in any  
26 private duty position as a registered nurse, a temporary nurse placement agency, a traveling nurse,  
27 or for an in-house nursing pool.

28     ///

1 Respondent shall not work for a licensed home health agency as a visiting nurse unless the  
2 registered nursing supervision and other protections for home visits have been approved by the  
3 Board or its successor. Respondent shall not work in any other registered nursing occupation  
4 where home visits are required.

5 Respondent shall not work in any health care setting as a supervisor of registered nurses.  
6 The Board or its successor may additionally restrict Respondent from supervising licensed  
7 vocational nurses and/or unlicensed assistive personnel on a case-by-case basis.

8 Respondent shall not work as a faculty member in an approved school of nursing or as an  
9 instructor in a continuing education program approved by the Board or its successor.

10 Respondent shall work only on a regularly assigned, identified and predetermined  
11 worksite(s) and shall not work in a float capacity.

12 If Respondent is working or intends to work in excess of 40 hours per week, the Board or  
13 its successor may request documentation to determine whether there should be restrictions on the  
14 hours of work.

15 **10. Complete a Nursing Course(s).** Respondent, at her own expense, shall enroll and  
16 successfully complete a course(s) relevant to the practice of registered nursing no later than six  
17 months prior to the end of her probationary term.

18 Respondent shall obtain prior approval from the Board or its successor before enrolling in  
19 the course(s). Respondent shall submit to the Board or its successor the original transcripts or  
20 certificates of completion for the above required course(s). The Board or its successor shall return  
21 the original documents to Respondent after photocopying them for its records.

22 **11. Cost Recovery.** Respondent shall pay to the Board or its successor costs associated  
23 with its investigation and enforcement pursuant to Business and Professions Code section 125.3  
24 in the amount of \$2,790.00. Respondent shall be permitted to pay these costs in a payment plan  
25 approved by the Board or its successor, with payments to be completed no later than three months  
26 prior to the end of the probation term.

27 If Respondent has not complied with this condition during the probationary term, and  
28 Respondent has presented sufficient documentation of her good faith efforts to comply with this

1 condition, and if no other conditions have been violated, the Board or its successor, in its  
2 discretion, may grant an extension of Respondent's probation period up to one year without  
3 further hearing in order to comply with this condition. During the one-year extension, all original  
4 conditions of probation will apply.

5 **12. Violation of Probation.** If Respondent violates the conditions of her probation, the  
6 Board or its successor after giving Respondent notice and an opportunity to be heard, may set  
7 aside the stay order and impose the stayed discipline (revocation/suspension) of Respondent's  
8 License.

9 If during the period of probation, an accusation or petition to revoke probation has been  
10 filed against Respondent's License or the Attorney General's Office has been requested to  
11 prepare an accusation or petition to revoke probation against Respondent's License, the  
12 probationary period shall automatically be extended and shall not expire until the accusation or  
13 petition has been acted upon by the Board or its successor.

14 **13. License Surrender.** During Respondent's term of probation, if she ceases practicing  
15 due to retirement, health reasons or is otherwise unable to satisfy the conditions of probation,  
16 Respondent may surrender her License to the Board or its successor. The Board or its successor  
17 reserves the right to evaluate Respondent's request and to exercise its discretion whether to grant  
18 the request, or to take any other action deemed appropriate and reasonable under the  
19 circumstances, without further hearing. Upon formal acceptance of the tendered license and wall  
20 certificate, Respondent will no longer be subject to the conditions of probation.

21 Surrender of Respondent's License shall be considered a disciplinary action and shall  
22 become a part of Respondent's license history with the Board or its successor. A registered nurse  
23 whose license has been surrendered may petition the Board or its successor for reinstatement no  
24 sooner than the following minimum periods from the effective date of the disciplinary decision:

25 (1) Two years for reinstatement of a license that was surrendered for any reason other  
26 than a mental or physical illness; or

27 (2) One year for a license surrendered for a mental or physical illness.

28 ///

1           14.   **Physical Examination.** Within 45 days of the effective date of this Decision,  
2   Respondent, at her expense, shall have a licensed physician, nurse practitioner, or physician  
3   assistant, who is approved by the Board or its successor before the assessment is performed,  
4   submit an assessment of the Respondent's physical condition and capability to perform the duties  
5   of a registered nurse. Such an assessment shall be submitted in a format acceptable to the Board  
6   or its successor. If medically determined, a recommended treatment program will be instituted  
7   and followed by the Respondent with the physician, nurse practitioner, or physician assistant  
8   providing written reports to the Board or its successor on forms provided by the Board or its  
9   successor.

10           If Respondent is determined to be unable to practice safely as a registered nurse, the  
11   licensed physician, nurse practitioner, or physician assistant making this determination shall  
12   immediately notify the Board or its successor and Respondent by telephone, and the Board or its  
13   successor shall request that the Attorney General's office prepare an accusation or petition to  
14   revoke probation. Respondent shall immediately cease practice and shall not resume practice  
15   until notified by the Board or its successor. During this period of suspension, Respondent shall  
16   not engage in any practice for which a license issued by the Board or its successor is required  
17   until the Board or its successor has notified Respondent that a medical determination permits  
18   Respondent to resume practice. This period of suspension will not apply to the reduction of this  
19   probationary time period.

20           If Respondent fails to have the above assessment submitted to the Board or its successor  
21   within the 45-day requirement, Respondent shall immediately cease practice and shall not resume  
22   practice until notified by the Board or its successor. This period of suspension will not apply to  
23   the reduction of this probationary time period. The Board or its successor may waive or postpone  
24   this suspension only if significant, documented evidence of mitigation is provided. Such  
25   evidence must establish good faith efforts by Respondent to obtain the assessment, and a specific  
26   date for compliance must be provided. Only one such waiver or extension may be permitted.

27           15.   **Participate in Treatment/Rehabilitation Program for Chemical Dependence.**  
28   Respondent, at her expense, shall successfully complete during the probationary period or shall

1 have successfully completed prior to commencement of probation a treatment/rehabilitation  
2 program approved by the Board or its successor of at least six months duration. As required,  
3 reports shall be submitted by the program on forms provided by the Board. If Respondent has not  
4 completed a treatment/rehabilitation program approved by the Board or its successor prior to  
5 commencement of probation, Respondent, within 45 days from the effective date of the decision,  
6 shall be enrolled in a program. If a program is not successfully completed within the first nine  
7 months of probation, the Board or its successor shall consider Respondent in violation of  
8 probation.

9 Based on recommendation of the Board or its successor, each week Respondent shall be  
10 required to attend at least one, but no more than five 12-step recovery meetings or equivalent  
11 (e.g., Narcotics Anonymous, Alcoholics Anonymous, etc.) and a nurse support group as approved  
12 and directed by the Board or its successor. If a nurse support group is not available, an additional  
13 12-step meeting or equivalent shall be added. Respondent shall submit dated and signed  
14 documentation confirming such attendance to the Board or its successor during the entire period  
15 of probation. Respondent shall continue with the recovery plan recommended by the  
16 treatment/rehabilitation program or a licensed mental health examiner and/or other ongoing  
17 recovery groups.

18 **16. Abstain from Use of Psychotropic (Mood-Altering) Drugs.** Respondent shall  
19 completely abstain from the possession, injection or consumption by any route of all controlled  
20 substances and all psychotropic (mood altering) drugs, including alcohol, except when the same  
21 are ordered by a health care professional legally authorized to do so as part of documented  
22 medical treatment. Respondent shall have sent to the Board or its successor, in writing and within  
23 fourteen (14) days, by the prescribing health professional, a report identifying the medication,  
24 dosage, the date the medication was prescribed, the Respondent's prognosis, the date the  
25 medication will no longer be required, and the effect on the recovery plan, if appropriate.

26 Respondent shall identify for the Board or its successor a single physician, nurse  
27 practitioner or physician assistant who shall be aware of Respondent's history of substance abuse  
28 and will coordinate and monitor any prescriptions for Respondent for dangerous drugs, controlled

1 substances or mood-altering drugs. The coordinating physician, nurse practitioner, or physician  
2 assistant shall report to the Board or its successor on a quarterly basis Respondent's compliance  
3 with this condition. If any substances considered addictive have been prescribed, the report shall  
4 identify a program for the time limited use of any such substances.

5 The Board or its successor may require the single coordinating physician, nurse  
6 practitioner, or physician assistant to be a specialist in addictive medicine, or to consult with a  
7 specialist in addictive medicine.

8 **17. Submit to Tests and Samples.** Respondent, at her expense, shall participate in a  
9 random, biological fluid testing or a drug screening program which the Board or its successor  
10 approves. The length of time and frequency will be subject to approval by the Board or its  
11 successor. Respondent is responsible for keeping the Board or its successor informed of  
12 Respondent's current telephone number at all times. Respondent shall also ensure that messages  
13 may be left at the telephone number when she is not available and ensure that reports are  
14 submitted directly by the testing agency to the Board or its successor, as directed. Any confirmed  
15 positive finding shall be reported immediately to the Board or its successor by the program and  
16 Respondent shall be considered in violation of probation.

17 In addition, Respondent, at any time during the period of probation, shall fully cooperate  
18 with the Board or its successor or any of their representatives, and shall, when requested, submit  
19 to such tests and samples as the Board or its successor or their representatives may require for the  
20 detection of alcohol, narcotics, hypnotics, dangerous drugs, or other controlled substances.

21 If Respondent has a positive drug screen for any substance not legally authorized and not  
22 reported to the coordinating physician, nurse practitioner, or physician assistant, and the Board or  
23 its successor files a petition to revoke probation or an accusation, the Board or its successor may  
24 suspend Respondent from practice pending the final decision on the petition to revoke probation  
25 or the accusation. This period of suspension will not apply to the reduction of this probationary  
26 time period.

27 If Respondent fails to participate in a random, biological fluid testing or drug screening  
28 program within the specified time frame, Respondent shall immediately cease practice and shall

1 not resume practice until notified by the Board or its successor. After taking into account  
2 documented evidence of mitigation, if the Board or its successor files a petition to revoke  
3 probation or an accusation, the Board or its successor may suspend Respondent from practice  
4 pending the final decision on the petition to revoke probation or the accusation. This period of  
5 suspension will not apply to the reduction of this probationary time period.

6       **18. Mental Health Examination.** Respondent shall, within 45 days of the effective date  
7 of this Decision, have a mental health examination including psychological testing as appropriate  
8 to determine her capability to perform the duties of a registered nurse. The examination will be  
9 performed by a psychiatrist, psychologist or other licensed mental health practitioner approved by  
10 the Board or its successor. The examining mental health practitioner will submit a written report  
11 of that assessment and recommendations to the Board or its successor. All costs are the  
12 responsibility of Respondent. Recommendations for treatment, therapy or counseling made as a  
13 result of the mental health examination will be instituted and followed by Respondent.

14       If Respondent is determined to be unable to practice safely as a registered nurse, the  
15 licensed mental health care practitioner making this determination shall immediately notify the  
16 Board or its successor and Respondent by telephone, and the Board or its successor shall request  
17 that the Attorney General's office prepare an accusation or petition to revoke probation.  
18 Respondent shall immediately cease practice and may not resume practice until notified by the  
19 Board or its successor. During this period of suspension, Respondent shall not engage in any  
20 practice for which a license issued by the Board or its successor is required, until the Board or its  
21 successor has notified Respondent that a mental health determination permits Respondent to  
22 resume practice. This period of suspension will not apply to the reduction of this probationary  
23 time period.

24       If Respondent fails to have the above assessment submitted to the Board or its successor  
25 within the 45-day requirement, Respondent shall immediately cease practice and shall not resume  
26 practice until notified by the Board or its successor. This period of suspension will not apply to  
27 the reduction of this probationary time period. The Board or its successor may waive or postpone  
28 this suspension only if significant, documented evidence of mitigation is provided. Such

evidence must establish good faith efforts by Respondent to obtain the assessment, and a specific date for compliance must be provided. Only one such waiver or extension may be permitted.

19. ~~Therapy or Counseling Program.~~ Respondent, at her expense, shall participate in an on-going counseling program until such time as the Board or its successor releases her from this requirement and only upon the recommendation of the counselor. Written progress reports from the counselor will be required at various intervals.

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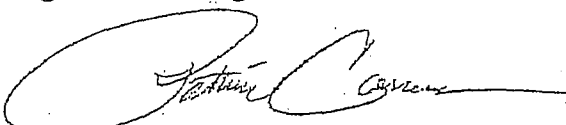
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ACCEPTANCE

I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully discussed it with my attorney, Daniel Thompson. I understand the stipulation and the effect it will have on my Registered Nurse License. I enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Registered Nursing or its successor.

DATED: 1-4-12



PATRICIA CORONA  
Respondent

I have read and fully discussed with Respondent Patricia Corona the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve its form and content.

DATED: 1-5-12



DANIEL THOMPSON  
Attorney for Respondent

ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Board of Registered Nursing or its successor of the Department of Consumer Affairs.

Dated: 1/6/12

Respectfully submitted,

KAMALA D. HARRIS  
Attorney General of California  
ARTHUR D. TAGGART  
Supervising Deputy Attorney General



GEOFFREY S. ALLEN  
Deputy Attorney General  
Attorneys for Complainant

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**Exhibit A**

Accusation No. 2011-919

1 KAMALA D. HARRIS  
Attorney General of California  
2 ARTHUR D. TAGGART  
Supervising Deputy Attorney General  
3 GEOFFREY S. ALLEN  
Deputy Attorney General  
4 State Bar No. 193338  
1300 I Street, Suite 125  
5 P.O. Box 944255  
Sacramento, CA 94244-2550  
6 Telephone: (916) 324-5341  
Facsimile: (916) 327-8643  
7 Attorneys for Complainant

8 BEFORE THE  
9 BOARD OF REGISTERED NURSING  
DEPARTMENT OF CONSUMER AFFAIRS  
10 STATE OF CALIFORNIA

11 In the Matter of the Accusation Against:

Case No.

2011-919

12 PATRICIA CORONA  
1108 Cardinal Street  
13 Lodi, California 95240

ACCUSATION

14 Registered Nurse License No. 718574

15 Respondent.

16 Complainant alleges:

17 PARTIES

18 1. Louise R. Bailey, M.Ed., RN ("Complainant") brings this Accusation solely in her  
19 official capacity as the Executive Officer of the Board of Registered Nursing ("Board"),  
20 Department of Consumer Affairs.

21 Registered Nurse License

22 2. On or about January 24, 2008, the Board issued Registered Nurse License Number  
23 718574 to Patricia Corona ("Respondent"). The registered nurse license was in full force and  
24 effect at all times relevant to the charges brought herein and will expire on March 31, 2013,  
25 unless renewed.  
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4. Code section 2764 provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under Code section 2811, subdivision (b), the Board may renew an expired license at any time within eight years after the expiration.

The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

(f) Conviction of a felony or of any offense substantially related to the qualifications, functions, and duties of a registered nurse, in which event the record of the conviction shall be conclusive evidence thereof.

In addition to other acts constituting unprofessional conduct within the meaning of this chapter [the Nursing Practice Act], it is unprofessional conduct for a person licensed under this chapter to do any of the following:

(c) Be convicted of a criminal offense involving the prescription, consumption, or self-administration of any of the substances described in subdivisions (a) and (b) of this section, or the possession of, or falsification of a record pertaining to, the substances described in subdivision (a) of this section, in which event the record of the conviction is conclusive evidence thereof.

7. Code section 125.3 provides, in pertinent part, that the Board may request the administrative law judge to direct a licensee found to have committed a violation or violations of

1 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
2 enforcement of the case.

3 FIRST CAUSE FOR DISCIPLINE

4 (Criminal Conviction)

5 8. Respondent has subjected her license to discipline pursuant to Code section 2761,  
6 subdivision (f) in that on or about May 27, 2010, in the Superior Court, County of Sacramento,  
7 California, in the matter entitled *People vs. Patricia Corona*, 2010, Case No. 10T02580,  
8 Respondent was convicted following her plea of no contest to a violation of Vehicle Code section  
9 23152, subdivision (b) (driving with a blood alcohol level of 0.20% or more), a misdemeanor.  
10 The circumstances of the crime are that on or about April 14, 2010, following a traffic stop,  
11 Respondent was arrested for driving under the influence of alcohol and failing to have a driver's  
12 or proof of insurance. Respondent's blood alcohol level was 0.21%. Such conduct is  
13 substantially related to the qualifications, functions, and duties of a licensed registered nurse.

14 9. Respondent has subjected her license to discipline pursuant to Code section 2761,  
15 subdivision (f) in that on or about March 16, 2011, in the Superior Court, County of San Joaquin,  
16 California, in the matter entitled *People vs. Patricia Corona*, 2010 Case No. LM042240A,  
17 Respondent was convicted following her plea of guilty to a violation of Vehicle Code section  
18 23152, subdivision (b) (driving with a blood alcohol level of 0.20% or more), a misdemeanor.  
19 The circumstances of the crime are that on or about January 22, 2010, following a traffic stop,  
20 Respondent was arrested for driving under the influence of alcohol and failing to have a driver's  
21 or proof of insurance. Respondent's blood alcohol level was 0.25%. Such conduct is  
22 substantially related to the qualifications, functions, and duties of a licensed registered nurse.

23 SECOND CAUSE FOR DISCIPLINE

24 (Conviction of a Crime Involving Alcohol)

25 10. Respondent has subjected her license to discipline pursuant to Code section 2761,  
26 subdivision (a), on the grounds of unprofessional conduct, as defined by Code section 2762,  
27 subdivision (c), in that Respondent has been convicted of a crime involving the consumption of  
28 alcohol, as more particularly set forth in paragraphs 8 and 9. above.

1 THIRD CAUSE FOR DISCIPLINE

2 (Use Alcohol to an Extent or in a Manner Dangerous or Injurious)

3 11. Respondent has subjected her license to discipline pursuant to Code section 2761,  
4 subdivision (a), on the grounds of unprofessional conduct, as defined in Code section 2762,  
5 subdivision (b), in that on or about April 14, 2010, and January 22, 2010, Respondent used  
6 alcohol to an extent or in a manner dangerous or injurious to herself or others, as more  
7 particularly set forth in paragraphs 8, and 9, above.

8 PRAYER

9 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
10 and that following the hearing, the Board of Registered Nursing issue a decision:

- 11 1. Revoking or suspending Registered Nurse License Number 718574, issued to Patricia  
12 Corona;
- 13 2. Ordering Patricia Corona to pay the Board of Registered Nursing the reasonable costs  
14 of the investigation and enforcement of this case, pursuant to Business and Professions Code  
15 section 125.3; and,
- 16 3. Taking such other and further action as deemed necessary and proper.
- 17
- 18

19 DATED: 5/9/11

20 Louise R. Bailey  
LOUISE R. BAILEY, M.ED., RN  
21 Executive Officer  
22 Board of Registered Nursing  
23 Department of Consumer Affairs  
24 State of California  
25 Complainant

26

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## **Exhibit B**

**Interagency Agreement between the Department of Consumer Affairs  
and the California Board of Registered Nursing**

## INTERAGENCY AGREEMENT

Between the Department of Consumer Affairs  
&  
California Board of Registered Nursing

WHEREAS, Business and Professions Code Sections 2701 and 2708, establishing the Board of Registered Nursing ("Board") and providing for an Executive Officer to perform the duties delegated by the Board will become ineffective and repealed effective January 1, 2012; and

WHEREAS, the Nursing Practice Act has not been repealed and will remain in full force and effect; and

WHEREAS, the Board is within the Department of Consumer Affairs ("Department"); and

WHEREAS, it is the mission of the Board and Department to provide as much consumer protection as possible; and

WHEREAS, the Board has, by vote at its meeting on November 16, 2011, delegated to the Department as of December 31, 2011, those duties, powers and responsibilities that the Board has previously delegated to the Board's Executive Officer as of December 31, 2011, and, further, approved entering into this agreement; and

WHEREAS, the Board and the Department wish to provide for the continued administration of those provisions of the Nursing Practice Act that have been delegated to the Board's Executive Officer in an uninterrupted and stable manner until legislation re-establishing the Board takes effect;

NOW THEREFORE, the parties to this Interagency Agreement (hereinafter "Agreement") agree as follows:

1. The Department accepts the delegation as approved by the Board and confirmed in this Agreement, and agrees to perform all such responsibilities in the best interests of protecting the public and consistently with the Nursing Practice Act.
2. The Board hereby authorizes and empowers the Department to the extent authorized by law, and subject to the review and approval of the State and Consumer Services Agency, to exercise those powers, duties and responsibilities that have been delegated to the Board's Executive Officer as of December 31, 2011, to administer the Nursing Practice Act.
3. The Board hereby authorizes the Department to utilize any previously appropriated funds of the Board to carry out the responsibilities in administering the Nursing Practice Act in conjunction with this Agreement; and those funds shall be used for the



purposes for which the Board of Registered Nursing Fund, Professions and Vocations Fund was established.

4. The Department shall adhere to all current Board policies while this Agreement is in effect; all regulations and policies that have been adopted by the Board as of December 31, 2011, shall remain in effect until the time that legislation re-establishing the Board takes effect.

5. This Agreement shall take effect on December 31, 2011, and remain in effect until the time that legislation re-establishing the Board takes effect.

6. In the event that any provision of this Agreement is unenforceable or held to be unenforceable, then the parties agree that all other provisions of this Agreement have force and effect and shall not be affected thereby.

IT IS SO AGREED:

Department of Consumer Affairs ("Department")

By Brian Stiger  
Brian Stiger, Acting Director

12/14/11  
Date

California Board of Registered Nursing

By Jeannine Graves  
Jeannine Graves, President  
Dorothy F. Miller, Vice President

12/14/11  
Date

Approved:

By Anita M. Caballero  
Anita M. Caballero, Secretary  
State and Consumer Services Agency

12/14/11  
Date